

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

RUBICON REAL ESTATE HOLDINGS, LLC,
BROWNE DESIGN CONSULTANTS, LLC
and JOSEPH BROWN,

Plaintiffs,
-vs-

Case No. 23-cv-10439
HON. PAUL D. BORMAN
Mag. Judge Curtis Ivy, Jr.

CITY OF PONTIAC, MICHIGAN and
GARLAND S. DOYLE, jointly and
severally,

Defendants.

DEFENDANTS' PRELIMINARY LAY WITNESS LIST

Defendants, CITY OF PONTIAC and GARLAND S. DOYLE, by and through
their Attorneys, ROSATI, SCHULTZ, JOPPICH & AMTSBUECHLER, P.C., submit
the following list of witnesses who may be called at the time of trial of this matter:

1. Joseph Brown, c/o Rubicon Real Estate Holdings, LLC, 6001 Cass Ave., Suite 03-174, Detroit, MI 48226
2. Rita Bolis, c/o Rubicon Real Estate Holdings, LLC, 6001 Cass Ave., Suite 03-174, Detroit, MI 48226
3. Manuel Ferraouiolo, c/o Rubicon Real Estate Holdings, LLC, 6001 Cass Ave., Suite 03-174, Detroit, MI 48226
4. Bradley Klintworth, c/o Rubicon Real Estate Holdings, LLC, 6001 Cass Ave., Suite 03-174, Detroit, MI 48226

5. Directors, officers, members, managers, employees, agents, representatives, and records custodian of Rubicon Real Estate Holdings, LLC, 6001 Cass Ave., Suite 03-174, Detroit, MI 48226.
6. Vladimir Abu-Ali, c/o DA Contracting, LLC, 28575 Greenfield Rd., Southfield, MI 48076
7. Directors, officers, members, managers, employees, agents, representatives, and records custodian of DA Real Estate Consulting, LLC and DA Contracting, LLC
8. Shala Preimer, Browne Design Consulting, 33717 Woodward Ave., Suite 201, Birmingham, MI 48009
9. David Lewis, Browne Design Consulting, 33717 Woodward Ave., Suite 201, Birmingham, MI 48009
10. Mi Pham, Browne Design Consulting, 33717 Woodward Ave., Suite 201, Birmingham, MI 48009
11. Taylor Clark, Browne Design Consulting, 33717 Woodward Ave., Suite 201, Birmingham, MI 48009
12. Directors, officers, members, managers, employees, agents, representatives, and records custodian of Browne Design Consultants, LLC, 33717 Woodward Ave., Suite 201, Birmingham, MI 48009
13. Directors, officers, members, managers, employees, agents, representatives, and records custodian of SK Properties (There are several corporations and LLCs with similar names registered with the state – I don't know which one it is.)
14. Garland S. Doyle, c/o City of Pontiac, 47450 Woodward Ave., Pontiac, MI
15. Jonathan Starks, c/o City of Pontiac, 47450 Woodward Ave., Pontiac, MI
16. Timothy Greimel, c/o City of Pontiac, 47450 Woodward Ave., Pontiac, MI
17. Khalfani Stephens, c/o City of Pontiac, 47450 Woodward Ave., Pontiac, MI
18. Ahmad Taylor, c/o City of Pontiac, 47450 Woodward Ave., Pontiac, MI
19. Kermit Williams, former President, Pontiac City Council

20. Randy Carter, former President Pro Tem and Pontiac City Councilmember
21. Patrice Waterman, former Pontiac City Councilmember
22. George Williams, former Pontiac City Councilmember
23. Mary Pietila, former Pontiac City Councilmember
24. Gloria Miller, former Pontiac City Councilmember
25. Doris Taylor Burks, former Pontiac City Councilmember
26. Megan Shramski, former Pontiac City Councilmember
27. Mark Holland, former Pontiac City Councilmember
28. Dierdre Waterman, former Mayor, City of Pontiac
29. Vern Gustafsson, c/o City of Pontiac, 47450 Woodward Ave., Pontiac, MI
30. Donovan Smith, former planning staff member, City of Pontiac
31. Patrick Brzozowski, c/o City of Pontiac, 47450 Woodward Ave., Pontiac, MI
32. Mike Wilson, Building Official, City of Pontiac, 47450 Woodward Ave., Pontiac, MI
33. Dwayne Lyons, 995 N. Cass Lake Rd., Apt. 128, Waterford, MI 48328
34. Directors, officers, members, managers, employees, agents, representatives, and records custodian of Innovative Community Elevations, LLC, 995 N. Cass Lake Rd., Waterford, MI 48328
35. Directors, officers, members, managers, employees, agents, representatives, and records custodian of SK Properties
36. Thomas Fitzpatrick, 23455 Shagwood Dr., Bingham Farms, MI 48025
37. Thomas Fitzpatrick II, 32572 W. Haverford, Franklin, MI 48025
38. Jeremiah Kromrei, 2250 Peters Rd., Ann Arbor, MI 48103
39. Directors, officers, members, managers, employees, agents, representatives, and records custodian of Family Rootz, LLC, 8164 Executive Ct., Suite C, Lansing, MI

40. James Skinner, 1009 Bruce St., Cottreville, MI 48039
41. Stephanie Skinner, 1009 Bruce St., Cottreville, MI 48039
42. Fernando DiCarlo, 54 Balding Blvd., Woodbridge, Ontario CA L4L3R9
43. Simonetta DiCarlo, 54 Balding Blvd., Woodbridge, Ontario CA L4L3R9
44. Darrell Blalock, 71679 Orchard End, Bruce, MI 48065
45. Directors, officers, members, managers, employees, agents, representatives, and records custodian of Pharmaco, Inc., 22000 Northwestern Hwy., Southfield, MI 48075
46. Directors, officers, members, managers, employees, agents, representatives, and records custodian of RWB Michigan, LLC, 22000 Northwestern Hwy., Southfield, MI 48075
47. Justin Dunaskiss, c/o Dunaskiss Consulting & Development, LLC, 900 S. Lapeer Rd., Oxford, MI 48371
48. Thomas Welch, 2670 W. Maple Rd., Troy, MI 48084
49. Kimberly Welch Harlan, 2670 W. Maple Rd., Troy, MI 48084
50. Richard Welch, 2670 W. Maple Rd., Troy, MI 48084
51. Directors, officers, members, managers, employees, agents, representatives, and records custodian of HWM Maple Road, Inc., 2670 W. Maple Rd., Troy, MI 48084
52. George A. Contis, Tenth Floor Columbia Center, 101 West Big Beaver Road, Troy, MI 48084
53. Anthony Chubb, Tenth Floor Columbia Center, 101 West Big Beaver Road, Troy, MI 48084
54. John Dawood Dalaly, 6463 Royal Pointe Dr., West Bloomfield, MI 48322
55. Julia Schafer Nunez, 22000 Northwestern Highway, Southfield, MI 48076
56. Christ Gorges, 39283 W. Royal Doulton Blvd., Clinton Township MI 48038
57. Colby De Zen, 22000 Northwestern Highway, Southfield, MI 48076

58. Michael Marchese, 22000 Northwestern Highway, Southfield, MI 48076
59. Brad Rogers, 22000 Northwestern Highway, Southfield, MI 48076
60. David Kotal, Federal Bureau of Investigation Detroit Division, Oakland County Resident Agency, 5600 Crooks Rd., Troy, MI 48098
61. All witnesses listed by Plaintiffs
62. Rebuttal witnesses
63. Witnesses necessary to authenticate documents for introduction and admission into evidence at trial.
64. Witnesses whose identities become known after the filing of this witness list through the time of trial of this matter.

Defendants reserve the right to amend and/or supplement this witness list through the time of trial.

s/ ANNE McCLOREY McLAUGHLIN
ROSATI, SCHULTZ, JOPPICH & AMTSBUECHLER, P.C.
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amclaughlin@rsjalaw.com
P40455

CERTIFICATE OF SERVICE

I certify that on July 21, 2023, the foregoing document was served on all parties or their counsel of record through the CM/ECF system.

s/ SHEILA BODENBACH